

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

ONE 2008 LAND ROVER RANGE ROVER
SPORT HSE, VEHICLE IDENTIFICATION
NUMBER (VIN) SALSK25428A146957,
WITH ALL APPURTENANCES AND
ATTACHMENTS THEREON,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, James L. Santelle, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for said district, alleges as follows:

1. This is a civil action *in rem* brought to enforce the provisions of Title 21, United States Code, Section 881(a)(6), which provide for the forfeiture of property that was purchased with proceeds traceable to an exchange of money for a controlled substance, in violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*

2. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

3. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest

warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

4. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this district.

5. The defendant property is one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957 seized from Robert Woods at 8XX E. Auer Street in Milwaukee, Wisconsin, on or about July 11, 2012. The defendant property is presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in the affidavit of Jason J. Soule, which is attached hereto as Exhibit A and is fully incorporated herein by reference.

7. On or about June 11, 2013, LaShawna Tolliver filed a claim to the defendant property.

8. The defendant, one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957, was purchased with proceeds traceable to an exchange of money for a controlled substance, in violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801, *et seq.*, and is therefore subject to forfeiture to the United States of America pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property, one 2008 Land Rover Range Rover Sport HSE bearing vehicle identification number (VIN) SALSK25428A146957, be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief

as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 4th day of September, 2013.

Respectfully submitted,

JAMES L. SANTELLE
United States Attorney

By:

s/SCOTT J. CAMPBELL
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